



INTEROFFICE CORRESPONDENCE



DATE February 8, 1993

TO K D Anderson, Radiological Engineering, Bldg T690B, X5151

FROM *[Signature]* D L Schubbe, Remediation Project Management, Bldg 080, X8709

SUBJECT RESPONSES TO COMMENTS ON THE PHASE I RCRA FACILITY INVESTIGATION/
REMEDIAL INVESTIGATION (RFI/RI) WORK PLAN FOR OPERABLE UNIT NO 15
(OU 15) - DLS-007-93

The purpose of this correspondence is to respond to comments by EG&G Radiological Engineering (RE) on the Phase I RCRA Facilities Investigation/Remedial Investigation (RFI/RI) Work Plan for Operable Unit No 15 (OU 15). The comments by Radiological Engineering and the responses to these comments by Remediation Project Management (RPM) are listed below.

- Comment #1 IHSSs 179, 180, 204 and 211 are located within Radiologically Controlled Areas (RCAs). There is a significant potential that difficulties will be encountered when attempting to remove equipment and materials from the RCA. Project Management should review all supply lists to ensure that only essential equipment and materials are brought into the area.
- Response #1 Remediation Programs Management (RPM) concurs and has considered the potential difficulties which may be encountered when attempting to remove equipment from Radiologically Controlled Areas (RCAs). RPM wishes to discuss this issue in more detail with RE in order to limit equipment and materials brought into the RCAs and plan for proper storage of equipment for future OU 15 use which may remain in the RCAs.
- Comment #2 Radiological surveys for direct alpha contamination, in addition to beta/gamma, should be included in the field sampling activities. Radiological swipes should also be counted for beta/gamma. Such actions are required by DOE Order 5480.11 and 5400.5.
- Response #2 RPM concurs. RPM does not anticipate that the increase in scope of work necessary to comply with DOE Order 5480.11 and 5400.5 while implementing the Work Plan for OU 15 will negatively impact the schedule or cost of performing OU 15 field work. However, RPM would like to discuss with RE compliance with DOE Order 5480.11 and 5400.5.
- Comment #3 References to the Environmental Management Radiological Guidelines (EMRGs) will be specified as Radiological Operating Instructions (ROIs) in all Work Packages and Radiation Work Permits since EG&G Radiological Operations will support field activities.
- Response #3 Environmental Management Radiological Guidelines (EMRGs) are referenced in the Quality Assurance Addendum (Section 10) and Field Sampling Plan (Section 7) of the Phase I RFI/RI Work Plan for OU 15 for selection of radiological equipment and designation of radiological operating procedures.

ADMIN RECORD

REVIEWED FOR CLASSIFICATION/UCM

By *Bea Duran* (un4)

Date 8-11-93

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- Comment #4 Please provide the engineering specifications on the steam unit to be used for field activities RE is requesting this due to personnel protection issues Also, there is concern that difficulties may arise in releasing the equipment from RCAs
- Response #4 Steam rinsate sampling equipment has not yet been selected The subcontractor awarded the subcontract for implementation of the Phase I RFI/RI Work Plan for OU 15 will be selecting the steam rinsate sampling equipment and preparing a Standard Operating Procedure for its use Subcontract award is expected on or before February 19, 1993 The subcontractor will provide EG&G Procurement with an equipment list and associated equipment costs in case the equipment will have to remain in the RCA and be purchased by EG&G RE will be provided with engineering specifications of the steam rinsate sampling equipment upon receipt of the specifications by RPM
- Comment #5 Has, or will, a Site Specific Health and Safety Plan (SSHSP) be generated for OU 15? RE must review and approve the Plan prior to any field activities being initiated
- Response #5 A Site Specific Health and Safety Plan (SSHSP) will be prepared by the subcontractor selected to implement the Phase I RFI/RI Work Plan for OU 15 RE will be provided with a copy of the SSHSP for review and comment prior to field activities being initiated
- Comment #6 The 90 hours of budgeted support to RE may not be sufficient for the SSHSP review process, field, programmatic, and technical support required for OU 15
- Response #6 Utilizing EG&G personnel (i.e., RPTs) to perform the radiological work for implementation of the Phase I RFI/RI Work Plan for OU 15 was not previously assumed Additional hours of budgeted support will have to be agreed upon by RPM and RE for EG&G RPT management and implementation of the radiological work associated with OU 15 RPM will draft an agreement containing a Statement of Work and schedule to be agreed upon by the parties concerned prior to EG&G RPT's conducting work for OU 15

If you have questions regarding this correspondence, please contact me at extension 8709

dmi

cc
M B Arndt
R L Benedetti
M S Buddy